

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS

vs.

MATTHEW S. MILLER

Defendant

No.

2019-cr-00265

**FILED**  
JUL 18 2019  
CLERK OF CIRCUIT COURT #34  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

**INDICTMENT**

*On this 18th day of July, 2019, the Grand Jury, chosen, and sworn for the County of Madison, State of Illinois, in the name and by the authority of the People of the state of Illinois, charges that:*

**MATTHEW S. MILLER**

*On or about June 23, 2019, at and in the County of Madison in the State of Illinois, committed the offense of:*

**COUNT I: PREDATORY CRIMINAL SEXUAL ASSAULT OF A CHILD (CLASS X – ENHANCED 50-60 YEARS)** in that said defendant, who was seventeen (17) years of age or older, committed an act of sexual penetration upon N.L. (female/DOB: 2/8/2017), who was under thirteen (13) years of age when the act was committed, in that said defendant inserted his penis into N.L.'s mouth, and said defendant delivered a controlled substance, cocaine, to N.L. without N.L.'s consent, in violation of 720 ILCS 5/11-1.40(a)(2)(D), and against the peace and dignity of the said People of the State of Illinois.

**COUNT II: PREDATORY CRIMINAL SEXUAL ASSAULT OF A CHILD (CLASS X)** in that said defendant, who was seventeen (17) years of age or older, committed an act of sexual penetration upon N.L. (female/DOB: 2/8/2017), who was under thirteen (13) years of age when the act was committed, in that said defendant inserted his penis into N.L.'s mouth, in violation of 720 ILCS 5/11-1.40(a)(1), and against the peace and dignity of the said People of the State of Illinois.

*On or about June 10, 2019, at and in the County of Madison in the State of Illinois, committed the offense of:*

**COUNT III: PREDATORY CRIMINAL SEXUAL ASSAULT OF A CHILD (CLASS X)** in that said defendant, who was seventeen (17) years of age or older, committed an act of sexual penetration upon N.L. (female/DOB: 2/8/2017), who was under thirteen (13) years of age when the act was committed, in that said defendant inserted his penis into N.L.'s mouth, in violation of 720 ILCS 5/11-1.40(a)(1), and against the peace and dignity of the said People of the State of Illinois.

*On or about June 23, 2019, at and in the County of Madison in the State of Illinois, committed the offense of:*

**COUNT IV: AGGRAVATED BATTERY (CLASS 3)** in that said defendant, in committing a Battery, in violation of 720 ILCS 5/12-3, knowingly and without legal justification, caused bodily harm to N.L. (female/DOB: 2/8/2017) a person under the age of 13 years, in that said defendant bit N.L. on the foot, in violation of 720 ILCS 5/12-3.05(b)(2), and against the peace and dignity of the said People of the State of Illinois.

**COUNT V: AGGRAVATED BATTERY (CLASS 3)** in that said defendant, in committing a Battery, in violation of 720 ILCS 5/12-3, knowingly and without legal justification, caused bodily harm to N.L. (female/DOB: 2/8/2017) a person under the age of 13 years, in that said defendant bit N.L. on the leg, in violation of 720 ILCS 5/12-3.05(b)(2), and against the peace and dignity of the said People of the State of Illinois.

**COUNT VI: AGGRAVATED BATTERY (CLASS 3)** in that said defendant, in committing a Battery, in violation of 720 ILCS 5/12-3, knowingly and without legal justification, caused bodily harm to N.L. (female/DOB: 2/8/2017) a person under the age of 13 years, in that said defendant bit N.L. on the hand, in violation of 720 ILCS 5/12-3.05(b)(2), and against the peace and dignity of the said People of the State of Illinois.

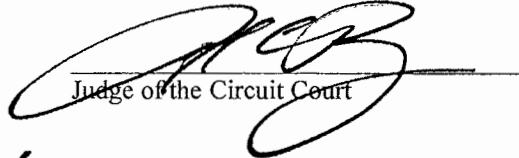
**COUNT VII: AGGRAVATED BATTERY (CLASS X)** in that said defendant, in committing a Battery, in violation of 720 ILCS 5/12-3, knowingly and without legal justification, caused great bodily harm to N.L. (female/DOB: 2/8/2017) a person under the age of 13 years, in that said defendant inserted his penis into N.L.'s mouth, tearing her frenulum, in violation of 720 ILCS 5/12-3.05(b)(1), and against the peace and dignity of the said People of the State of Illinois.

**A TRUE BILL**

  
Foreperson of the Grand Jury

The within indictment returned in open court this 18th day of July, 2019.

Bail is set at \$ \_\_\_\_\_, Warrant of Arrest ordered to issue.

  
Judge of the Circuit Court

WITNESSES: TROY, CITY OF D. J. K. No